

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HINSHAW & CULBERTSON LLP and HOGUET
NEWMAN REGAL & KENNEY, LLP,

Plaintiffs,

-against-

MARC A. BRUNER, CARMEN LOTITO, KELLY
H. NELSON, RESOURCE VENTURE
MANAGEMENT AG, EQUISTAR CAPITAL,
LLC, BCI INTERNATIONAL HOLDINGS, INC.,
BIO-COMPOSITES INTERNATIONAL, INC., and
BIOFIBRE TECHNOLOGY INTERNATIONAL,
INC.,

Defendants.

MOTION TO ADMIT COUNSEL

PRO HAC VICE

07 Civ. 9391 (WHP)

ECF Case

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the
Southern and Eastern Districts of New York, I, Bryan L. Berson, a member in good standing of
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

John Voorhees
Patton Boggs LLP
1801 California Street, Suite 4900
Denver, Colorado 80202
303-830-1776
303-894-9239, facsimile

Mr. Voorhees is a member in good standing of the Bar of the States of Colorado, District of
Columbia, Massachusetts and Rhode Island.

There are no pending disciplinary proceedings against Mr. Voorhees in any State or Federal
court.

DATED: January 11, 2008
New York, New York:

JAN 23 2008
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\$25-52
DCA

Respectfully submitted,

By: Bryan L. Berson
Bryan L. Berson (BB3271)
PATTON BOGGS, LLP
1675 Broadway
New York, NY 10019

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2008, I caused a true and correct copy of the foregoing
MOTION TO ADMIT COUNSEL PRO HAC VICE, AFFIDAVIT IN SUPPORT OF MOTION
TO ADMIT PRO HAC VICE and PROPOSED ORDER to be placed into the US Mail, postage
prepaid, addressed to the following:

J. Richard Supple, Jr.
HINSHAW & CULBERTSON LLP
780 Third Avenue
New York, NY 10017

Frederick S. Newman
HOGUET NEWMAN REGAL & KENNEY
10 E 40th Street
New York, NY 10016

Bryan L. Berson

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NEWMAN REGAL & KENNEY, LLP,

Plaintiffs,

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MARC A. BRUNER, CARMEN LOTITO, KELLY
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LLC, BCI INTERNATIONAL HOLDINGS, INC.,
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BIOFIBRE TECHNOLOGY INTERNATIONAL,
INC.,

Defendants.

AFFIDAVIT OF BRYAN L.
BERSON IN SUPPORT OF
MOTION TO ADMIT
COUNSEL PRO HAC VICE
07 Civ. 9391 (WHP)
ECF Case

State of New York)
) ss.
City and County of New York)

Bryan L. Berson, being duly sworn, hereby deposes and says as follows:

1. I am an Associate at the law firm of Patton Boggs, LLP, and counsel for Defendants in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit John Voorhees as counsel pro hac vice to represent the Defendants in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in January 22, 2003. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. John Voorhees is a Partner at the law firm of Patton Boggs LLP. I know Mr. Voorhees through our association as members of the same law firm, he in the Denver, Colorado office and I in the New York, New York office.
4. I have found Mr. Voorhees to be a skilled attorney, a person of integrity and high moral character. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
5. Accordingly, I am pleased to move the admission of John Voorhees, pro hac vice.
6. I respectfully submit a proposed order granting the admission of John Voorhees, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit John Voorhees, pro hac vice, to represent Defendant in the above captioned matter, be granted.

DATED: January 11, 2008
New York, New York:

Respectfully submitted,

By: Bryan L. Berson
Bryan L. Berson (BB3271)
PATTON BOGGS, LLP
1675 Broadway
New York, NY 10019

SWORN BEFORE ME this 11th day of January, 2008

My commission expires: 2011

Doreen S. Thompson
Notary **DOREEN S. THOMPSON**
Notary Public, State of New York
No. 41-4897990
Qualified in Queens County
Commission Expires June 8, 2011

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HINSHAW & CULBERTSON LLP and HOGUET
NEWMAN REGAL & KENNEY, LLP,

Plaintiffs,

-against-

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LLC, BCI INTERNATIONAL HOLDINGS, INC.,
BIO-COMPOSITES INTERNATIONAL, INC.,
and BIOFIBRE TECHNOLOGY
INTERNATIONAL, INC.,

Defendants.

ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION
07 Civ. 9391 (WHP)
ECF Case

Upon the Motion of Bryan Berson, attorney for Defendant and said sponsor attorney's affidavit
in support;

IT IS HEREBY ORDERED that

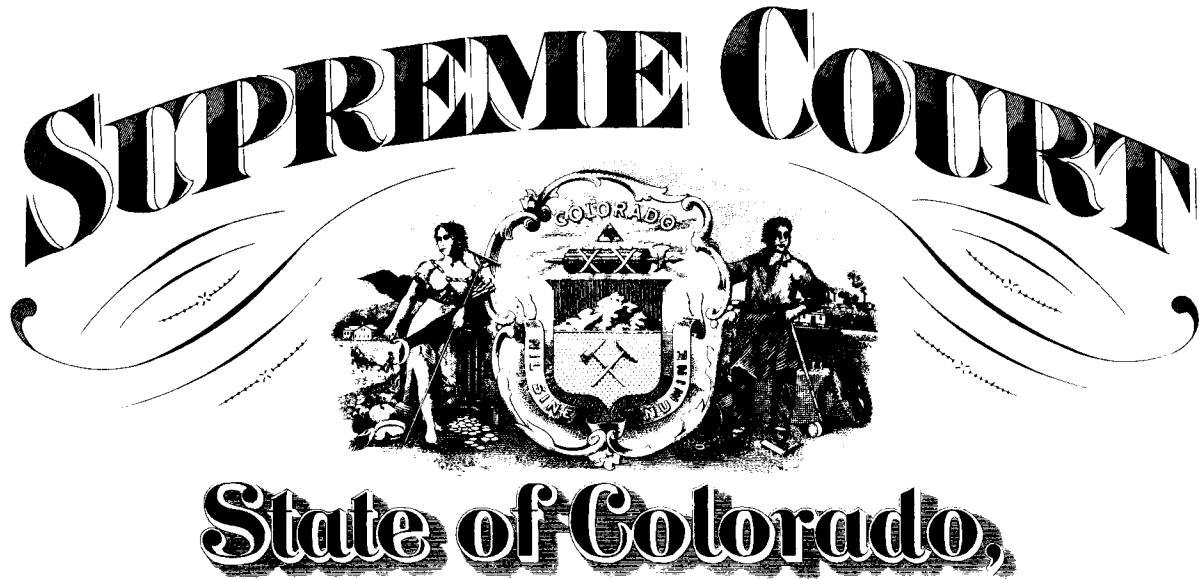
John Voorhees
PATTON BOGGS LLP
1801 California Street, Suite 4900
Denver, Colorado 80202
303-830-1776
303-894-9239, facsimile
jvoorhees@pattonboggs.com

is admitted to practice pro hac vice as counsel for Defendant in the above captioned case in the
United States District Court for the Southern District of New York. All attorneys appearing
before this Court are subject to the Local Rules of this Court, including the Rules governing
discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system,

counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

DATED: January ___, 2007
New York, New York:

By: _____
United States District Court Judge



STATE OF COLORADO, ss:

I, Susan J. Festag Clerk of the Supreme Court of the State of Colorado, do hereby certify that

JOHN VOORHEES

has been duly licensed and admitted to practice as an

ATTORNEY AND COUNSELOR AT LAW

within this State; and that his/her name appears upon the Roll of Attorneys and Counselors at Law in my office of date the 8th day of October A. D. 1992 and that at the date hereof the said JOHN VOORHEES

is in good standing at this Bar.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

3rd day of January A. D. 2008

Susan J. Festag

Clerk





District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that


JOHN VOOREHEES

was on the 21ST day of DECEMBER, 1976

duly qualified and admitted as an attorney and counselor. This attorney is, on the date indicated below, voluntarily registered as an inactive member in good standing of the District of Columbia Bar and, therefore, is not currently eligible to practice law in the District of Columbia.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on January 2, 2008.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

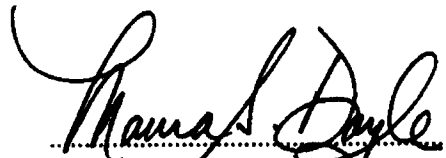
BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **eighteenth** day of **October** A.D. **1989**, said Court being the highest Court of Record in said Commonwealth:

John Voorhees

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **fourth** day of **January** in the year of our Lord **two thousand and eight**.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

RHODE ISLAND SUPREME COURT

Office of the Clerk

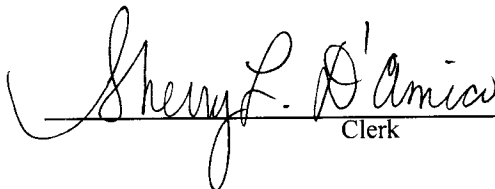


Licht Judicial Complex
250 Benefit Street
Providence, RI 02903

JOHN VOORHEES
PATTON BOGGS LLP
1801 CALIFORNIA STREET
SUITE 4900
DENVER, CO 80202

This certifies that JOHN VOORHEES of DENVER, COLORADO, is an Attorney and Counselor of the Supreme Court of the State of Rhode Island, and as such was on 18-NOV-1988 admitted to practice in all the Courts of said State, as appears of record in this the office of the clerk of the Supreme Court of said State and is in good standing and qualified to practice in said Courts. The Supreme Court is the highest Court in the State.

Given under my hand and the seal of said Supreme Court
at Providence, on December 31, 2007.


Clerk